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**VIA ECF**

The Honorable Andrew L. Carter, Jr., U.S.D.J.  
United States District Court  
United States District Court for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re: *United States of America v. Valeria Ruth HaCohen,***  
**Case No. 1:20-cr-00648-ALC**

Dear Judge Carter:

We represent the defendant, Valeria Ruth HaCohen, in the above-referenced matter. We write to request a modification of the conditions of Ms. HaCohen's release to permit her to travel to Israel from August 12, 2023 through September 3, 2023.

The reason for this request is that Ms. HaCohen's ex-husband, the father of her children, currently lives in Israel. Ms. HaCohen seeks permission to travel to Israel with her children so her children can visit their father. Ms. HaCohen is required to share custody of the children with her ex-husband, and the children are required to be accompanied by an adult on this type of international travel. Under the current conditions of release, such travel is not permitted without leave of Court. Copies of the airline booking confirmations are attached hereto as Exhibit A.

If the Court approves this request, Ms. HaCohen would timely provide her flight details, trip itinerary, and any other information the Court or the Office of Pretrial Services might need regarding her travel plans. The Office of Pretrial Services and the United States Attorney's Office for the Southern District of New York have indicated they take no position regarding this request.

We are most grateful for the Court's consideration of this request, and are available to answer any questions or discuss this matter with the Court in further detail.

Respectfully submitted,  
/s/ Ernest Edward Badway  
Ernest Edward Badway

Enclosure(s)

cc: All Counsel (via ECF)

The application is **GRANTED**.  
So Ordered.

6/28/23